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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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LUIS FELIPE MORENO-GODOY,

Plaintiff,

14-CV-07082 (PAE)

-against-

GALLET DREYER & BERKEY, LLP, ROGER L.
STAVIS, ESQ., and STEVEN R. KARTAGENER, ESQ.

Defendants.

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**DEFENDANT GALLET DREYER & BERKEY, LLP'S
PROPOSED VOIR DIRE QUESTIONS**

In addition to the Court's customary *voir dire* questions regarding county of residence, occupation, and prior jury service, we respectfully request the *voir dire* questions which follow:

1. Have you or any member of your family had any negative experience with a law firm?
2. Have you or any member of your family ever been involved, either as a plaintiff or defendant in civil litigation? What were the circumstances?
3. What are your overall impressions of lawyers?
4. Have you or any member of your family been the victim of a crime?
5. Have you or any member of your family been involved in a criminal court case, either as witness or defendant?

6. In your everyday life, what process do you use to assess whether someone is telling you the truth?

Dated: New York, New York
February 22, 2022

GALLET DREYER & BERKEY, LLP

/s/ Jared B. Foley

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